

The Central Long Island Chapter of the Surfrider Foundation requests that the following considerations be made an immediate part of the Draft Environmental Impact Study for LIPA and FPL 's proposed offshore wind turbine facility:

1. Stop the fast tracking of this process until all rules, regulations and guidelines for all offshore renewable energy projects have been promulgated by Mineral Management Services.
2. Full NEPA compliance including a full range of alternatives and a cost benefit analysis that incorporates all economic aspects of this proposal (i.e. commercial and recreational fisheries, maritime trade, tourism, property values, etc.) and not just the benefits or siting of the entire wind plant proposal.
3. Require applicants to explain in full and clear detail how and why the turbine locations were selected and what avoidance and minimization measures are incorporated into the project design to avoid or reduce fish and wildlife impacts.
4. Require site specific studies be undertaken to document resources that may be affected by the transmission cable from its oceanic connection terminal to its final destination on land.
5. Require applicants to provide clear justification, through environmental analysis, for their choice of the cable route and to explain why they have not explored other feasible routes such as usage of the Wantagh Causeway.
6. Require that MMS hold the permit application in abeyance until

the applicants erect a jack up barge platform in the proposed area and conduct radar surveys for winged species passing through this region for three years prior to any start up. Require specifically that three years of pre-construction studies be completed using a combination of radar (horizontal and vertical), acoustic, direct field sampling, and visual observation be employed. Require that the remote sensing (radar & acoustic) should be operated continually 365 days of the year.

7. Require that applicants provide full descriptions of how the applicants intend to avoid avian electrocutions, serving as perching areas, and lighting schemes for all structures.

8. Require that formal consultations under Section 7 of the Endangered Species Act for all federally listed threatened and endangered species occurring in this region be undertaken and incorporated into the DEIS.

9. Require that applicants evaluate the potential effects of the proposed project on all significant habitats in the area and that applicants provide the results in the DEIS.

10. Require applicants to complete a navigation risk assessment of the proposals potential impact on navigational and aviation safety, search and rescue operations, communications, radar, and positioning systems.

11. NEPA requires that all direct, secondary and cumulative impacts of all recent past, present, and future foreseeable actions be included in the assessment. To accomplish, require applicants to use a full ecosystem and multi-ecosystem approach to the task at hand.

12. Require that accurate assessments of ensuing essential fish habitat (EFH) damage, pursuant to the Magnuson-Stevens

Fisheries Conservation Management Act, be incorporated into the DEIS. This will not only include the direct impacts but indirect and cumulative as well.

13. Important coastal zone implications, such as conflicts with traditional use and economic dependency with respect to the siting of this proposal, must be addressed in the DEIS.

14. Only peer reviewed technical literature and ready for staff and public review should be included in the DEIS. Internal industry reports may be included but should not be the basis used in this decision making process. These internal documents should also clarify how the circumstances described in the citation compare with the proposed project.

15. Require the project proponent to address environmental impacts that would accrue in all construction and lay down areas to ensure that sediment contours are restored to their pre-construction elevations and stabilized so they can be expeditiously re-colonized.

16. Require a wetland and aquatic bed survey and developed strategy to ensure that existing values and functions of littoral habitats are maintained.

17. Require a detailed analysis of the potential for thermal loading and electromagnetic fields associated with this entire proposal of the adverse effects that would result and an explanation of how they will avoid these impacts.

18. Require a sediment transport model data that forecasts erosional patterns and processes under normal and significant storm events for all seasons.

19. Require a full cumulative impact analysis regarding cultural and natural resources that fully considers the impacts to the view

shed.

20. Require the applicant to provide a full listing of all of the various permits (federal, state, county and local) that it will need in order to proceed. This list should include timeframes and current status of each individual permit action.

21. Require an analysis of credible storm strikes on the integrity of the proposed projects structures.

22. Require that LIPA's Master Energy Plan appear in the DEIS.

23. Require the applicants to provide their plans for offshore oil and fuel spill discharges and publish results in DEIS.

24. The State of New Jersey's Coastal Zone Management Office must be consulted and kept apprised of all developments. This project will impact New Jersey's ports, shipping traffic, fisheries, tourism, land traffic, and numerous other adjacent issues including the City of Bayonne being used as the staging and lay down area for this proposal.

25. DEIS should include a full discussion of how this means of creating electricity will lead to the diminished use of fossil fuels.

26. Require applicants to assess the likely cost, in terms of psychological stress and potential associated health care costs, on all residents living within one hour from all impacted beaches, that may result from the project's destruction of the view shed of an internationally known oceanfront state park that people have enjoyed for 60 years.

27. Require that applicants determine the economic costs of potential lost revenues to affected municipal, state, and national parks and adjacent communities over the next thirty years should

people reduce the number of visits made to affected parks and their adjacent communities due to potential visual and auditory pollution in the parks from this facility.

28. Require that applicants assess fully all possible cultural and economic costs regionally and nation-wide that might result over 30 years from similar projects being located adjacent to both coastal and interior state and national parks, should construction of this facility establish a cultural or legal precedent whereby parklands will no longer be protected from adjacent industrial site.

29. Require applicants to assess any possible effects on beach morphology that might occur along all shorelines within 25 miles of the project due to changes in wave patterns resulting from wave refraction around the facility's structures.